

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

NO. 15-20652

v.

HON. GEORGE CARAM STEEH

D-1 BILLY ARNOLD,
a/k/a "B-Man,"
"Berenzo,"
"Killa".

18 U.S.C. § 1962(d);
18 U.S.C. § 1959(a)(1);
18 U.S.C. § 1959(a)(3);
18 U.S.C. § 1959(a)(5);
18 U.S.C. § 924(c);
18 U.S.C. § 924(j);
18 U.S.C. § 922(g)(1);
18 U.S.C. § 2

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NINTH SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. 1962(d) – *RICO Conspiracy*

D-1 BILLY ARNOLD

The Enterprise

1. The Seven Mile Bloods, commonly referred to as, and hereinafter referred to as, "SMB", were a street gang that operated primarily on the east side of Detroit, Eastern District of Michigan, specifically the area in and

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around Gratiot Avenue to the west, Kelly Road to the east, Eight Mile Road to the north, and Seven Mile Road to the south. SMB members claimed this area as their territory and referred to it as the "Red Zone." The main streets in the area that SMB conducted many of its illegal activities were Lappin, Coram, Novara, Liberal, Manning, and Tacoma. This particular area of Detroit's zip code is 48205, which SMB members and associates often referred to as "4-8-2-0-Die".

2. In addition to the members who directly claimed SMB, the enterprise also consisted of subsets that were affiliated with the gang, such as "55" and "SMB Jrs", who changed its name to "Hobsquad" in honor of SMB Jr. member Ihab Maslamani who was convicted of murder.

3. SMB members and associates utilized a variety of unifying marks, manners, and identifiers, including "gang signs," clothing, and tattoos that are specific to the organization. SMB colors were predominately red, which the gang members and associates signified by wearing red clothing, hats, and bandanas. A common symbol is the five-pointed star, a hand sign with all five fingers, or a crown with five points, which represents the fact that SMB based itself on the Bloods founded in Los Angeles, California which belonged to the "People Nation," an alliance of various street gangs.

4. SMB members also utilized the number "762", which stands for the numbers on a keypad that a person would push to type out SMB, and "19 13 2" which represented the numerical order in the alphabet for SMB. Members often tattooed themselves with these gang symbols. SMB members also used hand signals to show their identification with SMB. For example, SMB members would hold their thumb and fingers in a manner that resembles the letter "b" which stands for "Blood". SMB members and associates regularly used social networking websites such as Facebook, Instagram, and YouTube, to post photographs, videos, and statements that identify and highlight their affiliation with the enterprise, as well as their gang-related accomplishments, thereby glorifying and perpetuating SMB. SMB was also involved in the rap music scene. SMB members and associates regularly posted videos of their rap music and discussed their gang affiliation and accomplishments via rap.

5. SMB members and associates frequently used cellular telephones to communicate with each other about their criminal activities, take and share pictures of themselves associating with each other, and save and share images and statements posted by rival gang members and associates on social media platforms.

6. SMB made its money predominately through the sale and distribution of controlled substances, including cocaine, heroin, marijuana, and various prescription pills. SMB members sold these controlled substances within the "Red Zone," utilizing vacant houses known as "trap houses." SMB members would often sell on the same block of Manning Street, sharing workers and firearms to distribute and protect their narcotics and territory. SMB members and associates also worked with each other travelling to, and recruiting others to travel to, other states to sell controlled substances.

7. SMB were rivals with several other street gangs, including Hustle Boyz, East Warren, Six Mile Chedda Ave, Gutta Boys, Gangster Disciples, and the Crips. Many of SMB's symbols, clothing, and sayings attempted to differentiate themselves from, or disrespect, their rivals. Because they were rivals with Crips, during communications, SMB members would replace the first letter of words beginning with a "C" with a "B". For example, the word "Cool" would be changed to "Bool".

8. As a way of showing disrespect towards rival gangs, SMB members used hand signs which they posted on social media. For example, to disrespect Hustle Boyz, who also go by "42", SMB members would pose for pictures holding four fingers on one or both hands, or four fingers on one

hand and two fingers in the other hand, in a down position to signal “dropping 4s” or “dropping 42s”. “Dropping” was an SMB reference to killing.

9. SMB members and associates worked together against rival gangs to defend, promote, and maintain the status and reputation of SMB and to retaliate with threats and acts of violence for perceived wrongs, frequently with the use of firearms.

10. From 2008 through September 2015, SMB was in a gang war off and on with other gangs in Detroit. While the rivalries between SMB and other gangs had existed for some time, the murder of a rival gang member on July 14, 2014, by SMB members exacerbated the tension between the gangs and led to an alliance of rival gangs including, but not limited to, Hustle Boyz, East Warren, Six Mile Chedda Ave., and Gutta Boys, against SMB. Since July 2014, these rivals violently attacked one another and posted respective “hit lists” on social media.

11. At all times relevant to this Count of the Ninth Superseding Indictment, in the Eastern District of Michigan, and elsewhere, SMB, including its leadership, members, and associates constituted an enterprise, as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an

ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

12. At various times relevant to this Indictment, BILLY ARNOLD and others, were members and associates of the Seven Mile Bloods.

Purposes of the Enterprise

13. The purposes of the enterprise included the following:

- a. Promoting and enhancing the enterprise and its members' and associates' activities, including narcotics distribution and acts of violence;
- b. Preserving and protecting the power, territory, and profits of the enterprise through the use of intimidation and violence, including assaults and threats of violence;
- c. Confronting and retaliating against rival gangs through the use of intimidation, threats of violence, and acts of violence;
- d. Maximizing profits for enterprise members from a variety of illegal activity, including narcotics distribution;
- e. Sharing and disseminating information about the plans and activities of the enterprise and its members and associates;

f. Keeping victims, potential witnesses, and community members in fear of the enterprise and in fear of its members and associates through violence, intimidation, and threats of violence;

g. Providing assistance to members and associates of the enterprise who committed crimes in order to hinder, obstruct, and prevent law enforcement authorities from successfully prosecuting offenders.

Manner and Means of the Enterprise

14. The manner and means used by the enterprise to further the goals of the enterprise and achieve its purposes included, but was not limited to, the following:

a. Enterprise members and associates committed, conspired, attempted and threatened to commit acts of violence including acts involving murder, attempted murder, and assaults with dangerous weapons to protect and enhance the enterprise and its members and to preserve, protect, and expand the power and reputation of the enterprise and its members;

b. Enterprise members and associates promoted a climate of fear through violence and threats of violence;

c. Enterprise members and associates used and threatened to use physical violence against various individuals;

d. Enterprise members and associates distributed controlled substances and transported and distributed proceeds from the sale of controlled substances;

e. Enterprise members and associates wore clothing and displayed hand signs signifying their affiliation with the enterprise and posted statements and pictures to social media platforms in which they affiliated themselves with the enterprise, often while in the company of other enterprise members and associates;

f. Enterprise members and associates frequently armed themselves with firearms to commit crimes and to project a violent attitude toward rival gang members and the community, often boasting on social media platforms about their possession of firearms, posting pictures of the firearms, and making statements about their willingness to use firearms;

g. Enterprise members and associates shared firearms and stored firearms for one another; and

h. Enterprise members and associates communicated with each other in person and by cell phone and social media platforms to plan, discuss, and coordinate criminal activities, and to receive direction, support, and encouragement for carrying out criminal activities.

The Racketeering Conspiracy

15. Beginning on a date unknown, but starting no later than the year 2003, and continuing to, at least, September 2017, in the Eastern District of Michigan and elsewhere,

BILLY ARNOLD

and other persons named and not named in this Ninth Seventh Superseding Indictment, being persons associated with, or members of, SMB, which enterprise is described more fully in Paragraphs 1 through 14 above, which was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly, willfully, and unlawfully combined, conspired, confederated, and agreed with one another to violate Title 18, United States Code, Section 1962(c); that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of said enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and (5), consisting of multiple:

a. Threats and acts involving murder, in violation of Michigan Compiled Laws, Sections 750.316(1), 750.317, 750.83, 750.157a(a), and 767.39;

b. Threats and acts involving robbery, in violation of Michigan Compiled Laws, Sections 750.530, 750.157a(a), 750.92, and 767.39;

c. Offenses involving conspiracy to distribute and distribution of controlled substances in violation of Title 21, United States Code, Sections 841 and 846;

d. Acts indictable under Title 18, United States Code, Section 1512 (witness intimidation).

16. It was part of the conspiracy that BILLY ARNOLD and others, known and unknown to the grand jury, agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

Overt Acts

17. In furtherance of the conspiracy, and to affect the object and purposes thereof, the defendant, and others known and unknown to the grand jury, committed various overt acts, including but not limited to the following:

(1) On or about May 17, 2013, BILLY ARNOLD received a telephone call from an inmate in the Michigan Department of Corrections. The inmate asked ARNOLD "who started SMB?" ARNOLD responded "you on the phone with him."

(2) On or about September 9, 2003, ANTHONY LOVEJOY, ROBERT BROWN, and others were found in the vicinity of Manning and

Monarch Streets, Detroit, Michigan with cocaine, marijuana, and U.S. currency.

(3) On or about May 3, 2004, in the vicinity of Tacoma and Queen Streets, Detroit, Michigan, BILLY ARNOLD was flagging down vehicles for the purpose of narcotics sales and was in possession of cocaine base (crack cocaine) and U.S. currency.

(4) On or about December 1, 2004, ANTHONY LOVEJOY and COREY BAILEY were found together at 14787 Tacoma Street, Detroit, Michigan with cocaine base (crack cocaine), narcotics packaging, and U.S. currency.

(5) On or about December 13, 2004, BILLY ARNOLD was found at 15714 Lappin Street, Detroit, Michigan in possession of a semi-automatic handgun.

(6) On or about April 7, 2005, a brick was thrown through the front window of 14961 Tacoma, a house whose resident had a dispute with SMB member COREY BAILEY. Later that evening, BILLY ARNOLD, accompanied by BAILEY and another SMB member, threatened the owner of 14961 Tacoma by brandishing a firearm at her.

(7) On or about March 31, 2006, COREY BAILEY and other SMB members and associates made threats to the residents of 14717 Tacoma Street, Detroit, Michigan.

(8) On or about July 11, 2006, BILLY ARNOLD was arrested by Detroit Police Officers and ARNOLD used a false name during arrest / booking.

(9) On or about December 1, 2006, BILLY ARNOLD was arrested driving a vehicle in the area of Queen and Tacoma Streets, Detroit, Michigan. ARNOLD was wearing a black leather coat with red and yellow stitching, black pants, a red/white shirt, and red shoes. ARNOLD provided law enforcement a false name during arrest / booking.

(10) On or about December 4, 2006, QUINCY GRAHAM, DIONDRE FITZPATRICK, and others were found at 14791 Manning Street, Detroit, Michigan, with heroin, marijuana, and U.S. currency.

(11) On or about April 17, 2007, BILLY ARNOLD fired multiple gunshots at an occupied car, targeting rival gang member D.M. as D.M. spoke to two civilians in the car, in Detroit, Michigan.

(12) On or about April 24, 2007, BILLY ARNOLD was arrested by law enforcement while in a vehicle with other SMB members and associates in the area of Lapping and Gratiot, Detroit, Michigan.

(13) On or about June 28, 2007, during a court hearing in Detroit, Michigan for BILLY ARNOLD, COREY BAILEY and other SMB members and associates confronted the complaining witness called her a snitch, threatened to shoot her house up, and threatened to assault her and her family.

(14) On or about August 16, 2007, ROBERT BROWN approached a vehicle operated by ANTHONY LOVEJOY on Manning Street, Detroit Michigan. BROWN was in possession of cocaine base (crack cocaine).

(15) On or about September 5, 2007, JEFFERY ADAMS and another SMB member were found together at 14815 Manning Street, Detroit, Michigan with marijuana, cocaine, and U.S. currency.

(16) On or about September 19, 2007, JAMES ROBINSON was in possession of a concealed loaded .40 caliber Glock handgun on Novara Street, Detroit, Michigan.

(17) On or about September 27, 2007, ANTHONY LOVEJOY, JEFFERY ADAMS, DIONDRE FITZPATRICK, and JEFFAUN ADAMS were found in a vacant house at 14754 Manning Street, Detroit, Michigan with marijuana, packaging materials, a digital scale, and U.S. currency.

(18) On or about November 28, 2007, DIONDRE FITZPATRICK and other SMB members and associates were found in a vacant house at 14754

Manning Street, Detroit, Michigan with cocaine, marijuana, packaging materials, a digital scale, and U.S. currency.

(19) On or about April 18, 2008, several SMB members were involved in an altercation with rival gang members when one of the SMB members shot E.M. on Morang Avenue, Detroit, Michigan.

(20) On or about April 26, 2008, QUINCY GRAHAM, STEVEN ARTHUR, JR., and another SMB member were found at 14164 Manning Street, Detroit, Michigan with heroin, cocaine, marijuana, a digital scale, packaging material, and U.S. currency.

(21) On or about July 29, 2008, ARLANDIS SHY and other SMB members and associates were found in the area of Tacoma and Queen Streets, Detroit, Michigan with heroin, cocaine base (crack cocaine), and U.S. currency.

(22) On or about December 10, 2008, ROBERT BROWN, JEFFERY ADAMS, STEVEN ARTHUR, JR., and others were found at 14110 Eastburn Street, Detroit, Michigan with marijuana, a handgun, and U.S. currency.

(23) On or about January 16, 2009, ARLANDIS SHY and another SMB member were found in an apartment in Charleston, West Virginia with drug packaging, marijuana, and U.S. currency.

(24) On or about January 30, 2009, ROBERT BROWN, JEFFREY ADAMS, and another SMB member were together in Charleston, West Virginia. ROBERT BROWN had in his possession \$3,164 and two Greyhound bus tickets, one in each direction between Detroit, Michigan to Charleston, West Virginia, in third-party names. JEFFREY ADAMS had marijuana, baggies of cocaine base (crack cocaine), and U.S. currency in his possession.

(25) On or about April 2, 2009, ARLANDIS SHY was arrested with marijuana and OxyContin pills in Charleston, West Virginia.

(26) On or about August 10, 2009, while serving a prison sentence with the Michigan Department of Corrections, BILLY ARNOLD was found to be in possession of a weapon because of gang issues.

(27) On or about November 6, 2009, COREY BAILEY was arrested in Charleston, West Virginia after tossing two bags of marijuana, approximately 53 Xanax pills, and cocaine to the ground.

(28) On or about April 19, 2011, STEVEN ARTHUR JR. and MARTEZ HICKS were found in a hotel room in Charleston, West Virginia, with marijuana, prescription pills, and U.S. currency.

(29) On or about February 8, 2012, COREY BAILEY was arrested in Charleston, West Virginia with approximately \$2,930 and approximately 53 Oxymorphone pills.

(30) On or about September 4, 2012, QUINCY GRAHAM was found in Dunbar, West Virginia in an apartment where approximately \$11,335 was found under the kitchen sink and an additional \$4,760 was found in a black duffel bag in a bedroom.

(31) On or about October 23, 2012, JEFFERY ADAMS posted on his Facebook status, "Public Service Announcement!!! S.M.B. we dont fuck wit teameast , new skool , hustlebumz , 220 , we not cool its on site when I c niggaz we put in 2 much work 2 let da streetz down its not beef its personal so nigga better strap dey seat beltz on an hope dey have a safe ride..... STR8DROP."

(32) On or about February 19, 2013, law enforcement officers located an AR-15 rifle and a loaded AR-15 magazine at 18803 Lamont Street, Detroit, Michigan, a residence utilized by SMB members and associates to store firearms.

(33) On or about February 23, 2013, in Detroit, Michigan, law enforcement officers recovered four loaded firearms, one unloaded firearm,

and \$4,866 in U.S. currency from a white BMW limousine that SMB members and associates were in.

(34) On or about March 8, 2013, a rap video entitled "HardWork Jig – Welcome To HOB City intro" was published on YouTube. The video features SMB member DONNELL HENDRIX and describes the murder conviction of SMB Jr. member IHAB MASLAMANI. Several other SMB members and associates also appeared in the video.

(35) On or about March 22, 2013, three days after he was released from prison and placed on parole, BILLY ARNOLD had telephone conversations with COREY BAILEY, who was incarcerated. During the conversations, ARNOLD told BAILEY that ARNOLD was going to be pushing pulls through others because he was on a tether. BAILEY told ARNOLD to take 2-3 thousand, put it in pills, "send em down the way nigga and watch your money come back." BAILEY told ARNOLD that he will see \$20,000 to \$30,000 back.

(36) On or about March 29, 2013, BILLY ARNOLD had a telephone conversation with COREY BAILEY, who was incarcerated. During the conversation, ARNOLD told BAILEY that ARNOLD was the C-E-O of SMB.

(37) On or about May 1, 2013, BILLY ARNOLD and other SMB members and associates were together in the vicinity of Boulder and

Manning, Detroit, Michigan. Law enforcement officers recovered a firearm that had been discarded onto the ground.

(38) On or about June 6, 2013, ARLANDIS SHY was in possession of a concealed loaded Taurus handgun on Coram Street, Detroit, Michigan.

(39) On or about September 16, 2013, JEFFERY ADAMS posted on his Facebook status, "Its seem like everybody SMB or HOBSQUAD beef wit niggaz always tellin da police (hustleboyz) been snitchin (220) snitchin got paper work on dem (maxout) snitchin on da news I guess SMB da last real niggaz left #SQUAD."

(40) On or about October 30, 2013, BILLY ARNOLD and other SMB members and associates were in a vehicle in the area of Eight Mile Road and Hoover Road, Detroit, Michigan. ARNOLD was driving the vehicle, which had a stolen license plate on it.

(41) On or about November 6, 2013, BILLY ARNOLD received a telephone call from an inmate in the Michigan Department of Corrections. The inmate informed ARNOLD that "Juan" lied about why he was in prison. After speaking with "Juan", ARNOLD told the caller to violate Juan, fuck him up, but to not take his flag.

(42) On or about November 7, 2013, a rap video entitled "Cocaine Sonny ft. Berenzo – 4820DIE starring Crystal the Doll" was published on

YouTube. In the video, BILLY ARNOLD, wearing a ski mask with the letters "S.M.B." and five separate five pointed stars, and COREY BAILEY reference "4820DIE" "the Redzone", and "55".

(43) On or about November 22, 2013, a rap video entitled "Cocaine Sonny ft. HardWork Jig & Berenzo – " I Hust" was published on YouTube. In the video, BILLY ARNOLD is wearing a ski mask with the letters "S.M.B." and two separate five pointed stars, COREY BAILEY and DONNELL HENDRIX reference "the Redzone", "the feds be on me", "55" and "free Sosa". In the video, BILLY ARNOLD positions his thumb and fingers to make the letter "b".

(44) On or about January 31, 2014, BILLY ARNOLD received a telephone call from an inmate in the Michigan Department of Corrections. ARNOLD told the inmate that ARNOLD was leaving West Virginia soon but he was waiting on his "last play".

(45) On or about February 21, 2014, a rap video entitled "COCAINE SONNY FT BERENZO & BLOCK – MURDA" was published on YouTube. In the video, BILLY ARNOLD is wearing a ski mask with the letters "S.M.B." and five separate five pointed stars. Other SMB members and associates in the video reference "the Redzone", "4820DIE", "drop 4", and "my squad".

(46) On or about March 13, 2014, BILLY ARNOLD received a citation in Charleston, West Virginia for driving without an operator's license.

(47) On or about July 14, 2014, in Detroit, Michigan, BILLY ARNOLD, assisted by COREY BAILEY, shot at a car containing D.P., M.D.-1, M.D.-2, and C.C. D.P. was killed and M.D.-1 was shot in the chest.

(48) On or about July 22, 2014, COREY BAILEY was arrested in the area of 15621 Novara Street, Detroit, Michigan after trying to conceal a loaded firearm from law enforcement. A loaded SKS rifle was also recovered nearby.

(49) On or about July 28, 2014, a rap album entitled "Betrayal: Stop Bleekin" was posted on YouTube by ROBERT BROWN, under the name of "RO Da Great," with rap songs performed by BROWN, BILLY ARNOLD, and DONNELL HENDRIX. SMB members and associates used "Bleekin" to describe persons who were cooperating with law enforcement in an attempt to intimidate those persons and others.

(50) On or about September 22, 2014, JEROME GOOCH and QUINCY GRAHAM were found in an apartment in Charleston, West Virginia that contained approximately 330 OxyContin pills, a loaded .45 caliber Glock handgun, and U.S. currency.

(51) On or about December 28, 2014, JEFFERY ADAMS posted a picture of four handguns on Facebook with the following title "42k we killin everything dey stand foe."

(52) On or about January 23, 2015, JEFFERY ADAMS posted a picture of himself and JEFFUAN ADAMS each holding a gun on Facebook with the following title "Buck Buck red dot a nigga #Gang."

(53) On or about January 30, 2015, after an SMB member was found not guilty of assault at a trial in Detroit, Michigan, the following was posted on Facebook: "My nigga BLOCK beat his case 2day! I hit the snitching ass lil nigga in his mouth and almost went 2 jail at Frank Murphy. The lil nigga was still trying 2 snitch after I hit him in his shit, some niggas never learn! Guess he got it hones from his snitching ass."

(54) On or about February 27, 2015, JEFFERY ADAMS posted on his Facebook status, "FULL KOURT PRE55 ON DA 5TREET5 IF U NOT #H5 #55 #000 OR #GANG 5HIT DROPIN."

(55) On or about March 2, 2015, JEFFERY ADAMS posted on his Facebook status, "IM WAR READY AT ALL TIME5 #000 #Gang."

(56) On or about March 3, 2015, ROBERT BROWN posted on his Facebook status, "ON THE 5 I LOVE ALL MY NIGGAS I WILL RIDE AND DIE 4 ALL MY NIGGAS THIS IS TO ALL MY NIGGAS WE ANIT LOSING

NO MORE BROTHERS EVERY BODY SQUAD IN COMMENT FOR AKA WHITE BOY JASON RIH 5 20 YEARS BLOOD #ZONELIFE.”

(57) On or about March 24, 2015, JEFFREY ADAMS created an Instagram Account titled “000Bigblood” that SMB used to post photographs of, and make threats against, rival gang members. SMB members and associates also posted pictures to this account of rival gang members that had been murdered or shot by SMB members and associates. SMB members and associates taunted rival gang members on the account by posting comments about rival gang members.

(58) On or about April 11, 2015, in Detroit, Michigan, ROBERT BROWN and other SMB enterprise members assaulted D.T. and took D.T.’s shoes, cell phone, and other property. After the robbery, BROWN and other SMB members fled to BROWN’S residence in Warren, Michigan. Shortly after, police officers arrived at BROWN’S residence where they encountered several individuals, including BROWN and BILLY ARNOLD. While at BROWN’S residence, officers recovered the property stolen from D.T.

(59) On or about April 15, 2015, BILLY ARNOLD recorded a video to his cell phone. The video depicted ARNOLD and several SMB members in a house rapping with lyrics that include “SMB762”, “my squad”, “7 Mile killers”, “fuck rat niggas like Bleek”, “the zone”, “it’s the whole city versus

SMB". At one point in the video, an SMB member raps "catch your mans at the, and shoot him in the e-y-e", a reference to the July 14, 2014 murder of D.P.

(60) On or about May 1, 2015, at approximately 10:30 a.m., BILLY ARNOLD sent text messages to ROBERT BROWN that stated, "I got in a shoot out last night dubb left me" and "A bullet pierce my hoodie".

(61) On or about May 1, 2015, after an SMB member was murdered earlier that day, BILLY ARNOLD and other SMB members and associates shot R.C. multiple times in Detroit, Michigan.

(62) On or about May 2, 2015, BILLY ARNOLD sent a text message to MATLEAH SCOTT that stated, "I can't talk to u sis I don't even care for living that's y everything u heard about dropping after we lost him I was on it and I'm not stopping to everybody dies everybody girls niggaz it don't matter It's ova u that wasn't nothing yesterday it's many more I've yall just know I got yall forever."

(63) On or about May 4, 2015, BILLY ARNOLD sent "SIS BLOCK" a text message that stated "I'm not going be able to see yall to everyone dead I don't care how many niggaz got shot these days he still gone I'm burning this city down...."

(64) On or about May 8, 2015, BILLY ARNOLD, KEITHON PORTER, and another SMB member shot and killed D.R.-1 and shot M.W. multiple times in Detroit, Michigan. Later that same day, BILLY ARNOLD sent MATLEAH SCOTT a text message that stated, "U should here bout it".

(65) On or about May 9, 2015, BILLY ARNOLD sent a text message to DERRICK KENNEDY that stated, "Dawg I aint trying to hear shit dawg I gotta nigga gone sell me a ar for 7 and it's a nigga now wit a choppa too we getting both igot to get back down the way get my shot dip don't play wit me right now man I know we always talking shit but this block and I'm ready to die right now."

(66) On or about May 9, 2015, BILLY ARNOLD sent a text message to ROBERT BROWN that stated, "Man I just hope you strap I'm tired of loosing niggaz because niggaz don't be strapped and in they own worlds real shit dawg."

(67) On or about May 10, 2015, a newspaper article describing the May 1, 2015, shooting of R.C. and a photograph of D.R.-1, who was shot and killed on May 8, 2015, were posted on the 000Bigblood Instagram account.

(68) On or about May 10, 2015, in Detroit, Michigan, BILLY ARNOLD and ROBERT BROWN shot over sixty rounds of ammunition at a car containing rival gang members D.P., D.C., and J.G.

(69) On or about June 7, 2015, D.C. and A.B. were shot in Roseville, Michigan by BILLY ARNOLD and another SMB member and associate.

(70) On or about June 18, 2015, BILLY ARNOLD, KEITHON PORTER, and other SMB members and associates were at 20075 Westphalia Street, Detroit, Michigan, a location where police found cocaine, marijuana, ecstasy pills, digital scales, empty ziplock bags, cellular phones, and ammunition. ARNOLD successfully fled the scene just as police entered.

(71) On or about July 27, 2015, JEFFERY ADAMS posted on his Facebook status, "Its 10 different gangs in 1 goup an yall still kant fuk wit us #42k #BADGUYZ 19 13 2."

(72) On September 25 and continuing into September 26, 2015, BILLY ARNOLD and several SMB members and associates met at the Crazy Horse strip club in Detroit, Michigan to celebrate the birthday of a deceased SMB member.

(73) On or about September 26, 2015, after leaving the Crazy Horse strip club BILLY ARNOLD and STEVEN ARTHUR JR. were arrested in possession of a Bushmaster .223 caliber rifle.

(74) On or about September 26, 2015, after leaving the Crazy Horse strip club, a SMB member was arrested after throwing a P89 Ruger 9mm handgun out of a passenger window of a car being driven by ARLANDIS SHY.

(75) On or about October 2, 2015, JEFFERY ADAMS posted on his Facebook status that a certain SMB gang member was a "federal informant."

(76) On or about August 1, 2016, during telephone call, BILLY ARNOLD threatened MATLEAH SCOTT stating that he would beat her ass and fuck her up.

(77) On or about September 1, 2017, JEFFAUN ADAMS posted to his Facebook account, "I can't believe this rat ass nigga Steveo man they found the weak link."

Notice of Acts with Enhanced Sentencing

18. On or about July 14, 2014, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed:

- a. an act involving first degree murder, that is, murdered D.P., perpetrated by means of lying in wait, or any other willful,

deliberate, and premeditated killing, in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39; and

- b. an act involving second degree murder, that is, murdered D.P., with the intent to kill, to do great bodily harm, and to act in wanton and willful disregard of the likelihood that the natural tendency of said act would cause death and great bodily harm, said act committed without premeditation and deliberation, in violation of Michigan Compiled Laws, Section 750.317 and 767.39.

19. On or about July 14, 2014, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted M.D.-1 with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

20. On or about July 14, 2014, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted M.D.-2 with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

21. On or about July 14, 2014, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted C.C. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

22. On or about May 1, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted R.C. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

23. On or about May 8, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, murdered D.R.-1, perpetrated by means of lying in wait, or any other willful, deliberate, and premeditated killing, all in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

24. On or about May 8, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted M.W. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

25. On or about May 8, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted D.R.-2 with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

26. On or about May 8, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted J.R. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

27. On or about May 10, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted

by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted D.P. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

28. On or about May 10, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted D.C. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

29. On or about May 10, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted J.G. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

30. On or about June 7, 2015, in the Eastern District of Michigan, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, committed an act involving murder, that is, assaulted D.C. with intent to

commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of 18 U.S.C. § 1962(d).

COUNT TWO

18 U.S.C. §§ 1959(a)(1); 2 – *Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. At all times relevant to this Ninth Superseding Indictment, there existed an enterprise, SMB, as more fully described in Paragraphs One through Fourteen of Count One of this Ninth Superseding Indictment, which are re-alleged and incorporated by reference as though set forth fully herein. SMB, including its leadership, members and associates constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Ninth Superseding Indictment, the above-described enterprise, SMB, through its members and associates,

engaged in racketeering activity as defined by Sections 1959(b)(1) and 1961(1) of Title 18, United States Code, namely acts involving murder and robbery in violation of Michigan State Law, offenses involving dealing in controlled substances in violation of 21 U.S.C. §§ 841 and 846, and acts indictable under 18 U.S.C. § 1512 (witness intimidation).

3. On or about July 14, 2014, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, murdered D.P.; in violation of Michigan Compiled Laws, Sections 750.316(1), 750.317, and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT THREE

18 U.S.C. §§ 924(c); 924(j); 2 – *Use and Carry of a Firearm During and in Relation to a Crime of Violence Causing Death*

D-1 BILLY ARNOLD

On or about July 14, 2014, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided

and abetted by each other and by others known and unknown to the grand jury, knowingly used and carried a firearm, and caused the death of a person, to wit: the murder of D.P., during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, murder in aid of racketeering, as alleged in Count Two; in violation of Title 18, United States Code, Sections 924(c); 924(j); and 2.

COUNT FOUR

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about July 14, 2014, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to murder M.D.-1; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FIVE

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about July 14, 2014, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to murder M.D.-2; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT SIX

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about July 14, 2014, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to murder C.C.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT SEVEN

18 U.S.C. §§ 924(c); 2 – *Use, Carry, and Discharge of a Firearm During and in Relation to a Crime of Violence*

D-1 BILLY ARNOLD

On or about July 14, 2014, in the Eastern District of Michigan, Southern Division, and elsewhere, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others, known and unknown to the grand jury, knowingly used and carried a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder in aid of racketeering, as

alleged in Counts Four, Five, and Six, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT EIGHT

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about May 1, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to murder R.C.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT NINE

18 U.S.C. §§ 924(c); 2 – *Use, Carry, and Discharge of a Firearm During and in Relation to a Crime of Violence*

D-1 BILLY ARNOLD

On or about May 1, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, knowingly used and carried a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder in aid of racketeering, as alleged in Count Eight, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT TEN

18 U.S.C. §§ 1959(a)(1); 2 – *Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and others SMB members and associates, aided and abetted by each other and by others known and

unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, murdered D.R.-1; in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT ELEVEN

18 U.S.C. §§ 924(c); 924(j); 2 – *Use and Carry of Firearm During and in Relation to a Crime of Violence Causing Death*

D-1 BILLY ARNOLD

On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, knowingly used and carried a firearm, and caused the death of a person, to wit: the murder of D.R.-1, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, murder in aid of racketeering, as alleged in Count Ten; in violation of Title 18, United States Code, Sections 924(c); 924(j); and 2.

COUNT TWELVE

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to murder M.W.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT THIRTEEN

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to murder D.R.-2; in violation of Michigan Compiled Laws, Sections 750.83 and 750.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FOURTEEN

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to

murder J.R.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT FIFTEEN

18 U.S.C. §§ 924(c); 2 – *Use, Carry, and Discharge of a Firearm During and in Relation to a Crime of Violence*

D-1 BILLY ARNOLD

On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, knowingly used and carried a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder in aid of racketeering, as alleged in Counts Twelve, Thirteen, and Fourteen, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIXTEEN

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about June 7, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, attempted to murder D.C.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT SEVENTEEN

18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 BILLY ARNOLD

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about June 7, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in SMB, an enterprise engaged in racketeering activity, assaulted A.B. with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT EIGHTEEN

18 U.S.C. §§ 924(c); 2 – *Use, Carry, and Discharge of a Firearm During and in Relation to a Crime of Violence*

D-1 BILLY ARNOLD

On or about June 7, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, BILLY ARNOLD and other SMB members and associates, aided and abetted by each other and by others known and unknown to the grand jury, knowingly used and carried a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder in aid of racketeering and assault with a dangerous weapon in aid of racketeering, as alleged in Counts

Sixteen and Seventeen, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT NINETEEN

18 U.S.C. § 922(g)(1) – *Felon in Possession of a Firearm*

D-1 BILLY ARNOLD

On or about September 26, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Bushmaster .223 caliber rifle, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF SPECIAL FINDINGS PURSUANT TO TITLE 18, UNITED
STATES CODE, SECTIONS 3591 AND 3592**

1. The allegations set forth in Counts 1 through 19 are repeated and re-alleged as if set forth fully herein.

2. As to Counts 2, 3, 10, and 11, the defendant BILLY ARNOLD:

(a) was 18 years of age or older at the time of the offenses alleged in Counts 2, 3, 10, and 11;

(b) intentionally killed D.P. (Counts 2 and 3) and D.R.-1 (Counts 10 and 11) (18 U.S.C. § 3591(a)(2)(A));

(c) intentionally inflicted serious bodily injury that resulted in the death of D.P. (Counts 2 and 3) and D.R.-1 (Counts 10 and 11) (18 U.S.C. § 3591(a)(2)(B));

(d) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and D.P. (Counts 2 and 3) and D.R.-1 (Counts 10 and 11) died as a direct result of these acts (18 U.S.C. § 3591 (a)(2)(C));

(e) intentionally and specifically engaged in an act of

violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that the participation in the act constituted a reckless disregard for human life and D.P. (counts 2 and 3) and D.R.-1 (Counts 10 and 11) died as a direct result of the act (18 U.S.C. § 3591 (a)(2)(D));

(f) committed the offenses alleged in Counts 2, 3, 10, and 11 after having been previously convicted of a Federal or State offense punishable by a term of imprisonment of more than 1 year, involving the use or attempted or threatened use of a firearm (as defined in section 921) against another person (18 U.S.C. § 3592(c)(2));

(g) in committing the offenses in Counts 2, 3, 10, and 11, knowingly created a grave risk of death to 1 or more persons in addition to D.P. (counts 2 and 3) and D.R.-1 (Counts 10 and 11);

(h) committed the offenses alleged in Counts 10 and 11 after substantial planning and premeditation to cause the death of a person (18 U.S.C. § 3592(c)(9)); and

(i) in committing the offenses in Counts 2, 3, 10, and 11,

intentionally killed and attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

FORFEITURE ALLEGATIONS
RICO FORFEITURE

The allegations contained in Count One of this Ninth Superseding Indictment are hereby repeated, re-alleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963. Pursuant to Federal Rule of Criminal Procedure Rule 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event the defendant is convicted under Counts One and Two of this Indictment.

As a result of committing the offense charged in Count One of this Indictment, the defendant, BILLY ARNOLD:

1. Have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1); and

2. Have property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

The interests of the defendant subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1) and (a)(3), include but are not limited to, a sum that represents the gross proceeds received by the defendant pursuant to his racketeering activities as charged in Count One of the Indictment during the relevant time period charged in the Indictment and all interests and proceeds traceable thereto.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot

be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 1963.

THIS IS A TRUE BILL

Dated: August 5, 2020

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER
United States Attorney

CRAIG F. WININGER
Acting Chief, Violent & Organized Crime Unit

s/A. Tare Wigod
A. TARE WIGOD
MARK S. BILKOVIC
RAJ PRASAD
Assistant United States Attorneys

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 15-20652
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number: 20-cr-20187
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned: Hon. Linda V. Parker
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <u>FT 14</u> FILED

Case Title: USA v. BILLY ARNOLD

CLERK'S OFFICE

AUG -- 5 2020

County where offense occurred : Wayne ✓

U.S. DISTRICT COURT
EASTERN MICHIGAN
☐ Petty

Check One: ☒ Felony ☐ Misdemeanor

☐ Indictment/ ☐ Information --- no prior complaint.

☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]

☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 15-20652

Judge: Hon. George Caram Steeh

- ☒ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 5, 2020

Date

✓

A. Tare Wigod
Assistant United States Attorney
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Detroit, MI 48226-3277
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.